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USDOC FOR 532/OEA/MNICKSON/ADYSON/TWILLIS/EHOLLAND  
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR PATRICK SANTILLO  
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: BMGT BEXP HK ETRD ETTC

SUBJECT: EXTRANCHECK: PRE LICENSE CHECK: DATA WORLD COMPUTER AND  
COMMUNICATION

REF: A) D410319 B) USDOC 00087

¶11. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶12. At the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) conducted a pre-license check (PLC) at Data World Computer and Communication, 12/F MLC Millennia Plaza, 663 Kings Road, Hong Kong (Data World). The items in question are various Sonicwall VPN and firewall products classified under export control classification number (ECCN) 5A002 and controlled for national security (NS) reasons. The license applicant is Sonicwall of Sunnyvale, California.

¶13. According to the Hong Kong Companies Registry, Data World Computer and Communication Limited was registered in 1987. It has the Hong Kong equivalent of USD 1 million in paid up share capital. Its directors are listed as Hong Kong residents, Lee, Chi Luen, Lee, Yuk Chun, Ng, Po Tong and Ng, Wing Hong Ben.

¶14. According to the company's web site ([www.dwcc.dataworld.com.hk](http://www.dwcc.dataworld.com.hk)), Data World is a leading value added distributor of many known IT products. The company specializes in five areas including network infrastructure, network management, network security, network communication and web applications.

¶15. On February 4, 2009, ECO visited Data World and met with Mr. Henry Ng, Senior Sales Manager. Mr. Ng confirmed the orders that are the subject of the license application noted above. He stated that these are destined for the Hong Kong Judiciary. Mr. Ng expects Data World to win a tender for provision of these items (he provided a copy of the tender documents). ECO found Mr. Ng. to be open and cooperative and he provided all requested documents and information. Mr. Ng is familiar with U.S. and Hong Kong export control rules applicable to this class of products.

¶16. Based on the information noted above, ECO believes that Data World is a suitable recipient of U.S. origin controlled technology.